

December 20, 2018

**VIA ECF**

Honorable Paul A. Crotty  
United States District Judge  
500 Pearl Street, Chambers 1350  
New York, New York 10007

Re: *New York Legal Assistance Group v. Board of Immigration Appeals*,  
18 Civ. 9495 (PAC)

Dear Judge Crotty:

Plaintiff and Defendants submit this joint letter proposing a briefing schedule for the parties' respective anticipated motions. Defendants seek to file a motion to dismiss (Doc. 19), and Plaintiff seeks to file a cross-motion for summary judgment (Doc. 20). Accordingly, the parties jointly propose the following briefing schedule:

- Defendants' Motion to Dismiss to be filed by January 25, 2019;
- Plaintiff's Combined Opposition and Cross-Motion for Summary Judgment to be filed by February 22, 2019;
- Defendants' Combined Reply and Opposition to Cross-Motion to be filed by March 22, 2019; and
- Plaintiff's Reply to be filed by April 12, 2019.

In light of the jointly proposed briefing schedule, the parties jointly request that the pre-motion conference on the anticipated motions currently scheduled for January 17, 2019, at 12:45 pm be adjourned *sine die*, unless the Court has reason to hold the conference otherwise. The parties have not previously requested adjournments or extensions of time.

Respectfully submitted,

/s/ Patrick D. Llewellyn  
Patrick D. Llewellyn\*  
Public Citizen Litigation Group

*Counsel for Plaintiff*  
\*Admitted pro hac vice

GEOFFREY S. BERMAN  
United States Attorney  
Southern District of New York

By: /s/ Arastu K. Chaudhury  
ARASTU K. CHAUDHURY  
Assistant United States Attorney  
Tel.: (212) 637-2633  
arastu.chaudhury@usdoj.gov

*Counsel for Defendants*

CC: All counsel of record (via ECF)